

AFFLE (INDIA) LIMITED
POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF THE DOCUMENTS

1. BACKGROUND

Affle (India) Limited (hereinafter referred to as the “Company”) presents policy statement for preservation and archival of its documents in accordance with the applicable laws including Regulation 9 and Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

2. OBJECTIVE OF POLICY

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in ordinary course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

3. LAW

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires the Board of Directors of the Company to frame a Policy for Preservation of Documents (“Policy”) classifying them into two categories:

- I. Documents whose preservation shall be permanent in nature; and
- II. Documents to be preserved for not less than eight years or as prescribed under the applicable laws, whichever is longer.

Regulation 30 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 provides that every company shall disclose on its website all such events or information which has been filed with stock exchange under the same regulation for a minimum period of 5 years and thereafter as per the archival policy of the Company.

4. DEFINITIONS

The definitions of some of the key terms used in this policy are given below:

- a) “**Applicable Law**” means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA), The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed.
- b) “**Documents**” refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law

for the time being in force or otherwise, maintained on paper or in Electronic Form.

- c) “Electronic Form” means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- d) “Policy” means this Policy on preservation and archival of documents
- e) “Company” means Affle (India) Limited.
- f) **Words and expressions** used and not defined herein but defined in Companies Act 2013, Securities Contracts (Regulation) Act 1956, SEBI Act 1992, and Rules/Regulations framed therein, and the listing agreement/s shall have the meaning respectively assigned to them in those provisions.

5. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

For preservation, the Company’s physical and electronic documents shall be classified as follows:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents whose preservation period shall not be less than eight years after completion of the relevant transactions.
- c) Documents whose preservation period shall be less than eight years after disclosure

The documents as specified in a), b) and c) above may be kept in electronic mode also. The list of documents for the above categories is given in the **Annexure**.

6. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

All the Employees on permanent roles of the Company are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

7. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case, the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

8. STATUTORY REQUIREMENTS

If as per any other laws of land, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved for the longest term as per the applicable statutory stipulations.

9. WEB HOSTING AND WEB ARCHIVAL

- a) The Company shall disclose on its website all events or information which has been disclosed

to Stock Exchange(s) and retain the same for period of five years.

b) At the end of five years, the information shall be archived and preserved for a further period of three years.

c) The audio recordings, video recordings, if any, of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means shall be hosted on the Company's website for a minimum period of two years and thereafter as per the policy.

10. DESTRUCTION OF DOCUMENTS

A document can be destroyed after the expiry of preservation period as mentioned in this policy with the approval of the Board of Directors, in cases where the approval of Board of Directors is mandated by any Law or Regulations for the time being in force, or by the Head of the Department, under intimation to the Company Secretary of the Company. Head of Department should keep proper records of documents destroyed.

11. REVIEW OF POLICY

The Company shall modify this Policy at any time with approval of the Board and in compliance of applicable laws. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy.

ANNEXURE

a) Documents Whose Preservation Shall Be Permanent in Nature

- Register of Members of the Company;
- Accounting and Finance records including Annual Financial statements and Audit Reports;
- Investment records;
- Development/Intellectual Property and Trade Secrets:
- Tax records including annual returns;
- Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
- Corporate Records including Certificate of Incorporation, Minutes of all general meeting, Board Meetings and Committee Meetings; Shareholders' and Joint Venture agreements and other Statutory Records;
- Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc);
- Any other record as may be decided by the Board of Directors of the Company from time to time;

b) Documents Whose Preservation Period shall Not Be Less Than Eight Years After Completion of The Relevant Transactions

- Board / Committee meetings' materials
- Bank Statements and vouchers;
- Filings with Stock Exchanges and other statutory authorities;
- Corporate Social Responsibility Records;
- Sponsorship Projects Records;
- Correspondence and Internal Memoranda;
- Security Deposit Receipts (after receipt of deposit money back);
- Tender Documents;
- Lease Deeds and Contracts;
- Legal files;
- Insurance Records including policies and claims;
- All e-mail correspondence, internal & external;
- Any other record as may be decided by the Board of the Company from time to time.

c) Documents whose preservation period shall be atleast 8 years after disclosure

- All Protected Disclosures in writing or documented along with the results of investigation relating under Whistle Blower Policy.

Version Control

| Version | Date | Description | Description of changes |
|----------------|-------------|--------------------|--|
| 1.0 | 06.08.2019 | Policy formation | Policy drafted and approved |
| 2.0 | 08.02.2025 | Updation | Updation for alignment with applicable provisions and as per SEBI (Listing Obligations and Disclosure Requirements) (Third Amendment) Regulations, 2024. |